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9 *Attorneys for Defendant La Bella Vita*  
10 *Equestrians LLC*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF NEVADA**

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14 LUCKY LAKE FARM & WATER LIMITED  
15 PARTNERSHIP, a Saskatchewan Limited  
Partnership; and SWIFT RIVER FARMS, LTD.,  
an Alberta corporation,

16 Plaintiffs,

17 v.

18 GORDON CLARK, an individual; RODNEY  
19 KOCH A/K/A GORDON CLARK, an individual;  
CINDY LOU ELLEN KOCH, an individual;  
20 KRYSTAL LEE CLARK, an individual;  
MICHAEL ROSE, an individual; MICHAEL  
21 ROSE & ASSOCIATES STRATEGIC  
CONSULTING INC., a Nova Scotia corporation;  
22 JEFF HOUGHTON, an individual; TW  
INTERNATIONAL INVESTMENTS LTD., a  
23 Bahamian Registered company; TW ADVISORS  
LTD., a British Virgin Islands registered  
24 company; TW FUNDS INC., a British Virgin  
Islands registered company; LA BELLA VITA  
25 EQUESTRIANS LLC, a Nevada limited liability  
company; LA BELLA VITA INTERNATIONAL  
26 EQUINE SALES LLC, a Nevada limited liability  
company; LIQUID LUXURY GROUP LLC, a  
27

CASE NO. 2:23-cv-01768-GMN-MDC

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
FOR DEFENDANT LA BELLA VITA  
EQUESTRIANS LLC TO RESPOND  
TO FIRST AMENDED COMPLAINT  
[ECF NO. 30]**

**(SECOND REQUEST)**

Nevada limited liability company;  
BLACKSTONE LUXURY GROUP LLC, a  
Nevada limited liability company; DOES I-XX,  
inclusive; and ROE CORPORATIONS I-X,  
inclusive,

Defendants.

Plaintiffs LUCKY LAKE FARM & WATER LIMITED PARTNERSHIP and SWIFT  
RIVER FARMS, LTD., (collectively “*Plaintiffs*”), and Defendant LA BELLA VITA  
EQUESTRIAN LLC (“*Defendant LBVE*”), by and through their respective counsel, hereby  
stipulate and agree as follows:

1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF No. 30).
2. On January 29, 2024, Defendant LBVE was served with the Summons and First Amended Complaint.
3. On February 15, 2024, the parties submitted their first request for an extension of time for Defendant LBVE to respond to the First Amended Complaint (ECF No. 59).
4. On February 20, 2024, the Court entered its Order granting the stipulated request for Defendant LBVE to file its response to the First Amended Complaint on or before March 8, 2024 (ECF No. 61).
5. The parties hereby agree and stipulate that Defendant LBVE’s response to the First Amended Complaint is now due on or before March 22, 2024.
6. Good cause exists for this extension to permit Defendant LBVE and Plaintiffs to continue ongoing discussions related to possible resolution of the claims between them.

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7. This Stipulation is made in good faith and not for any purposes of delay.

Dated: March 5, 2024.

**HOLLEY DRIGGS**

/s/ Jason D. Smith

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*Attorneys for Defendant La Bella Vita  
Equestrians LLC*

Dated: March 5, 2024.

**FLYNN GIUDICI, PLLC**

/s/ Shamus S. Flynn

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*Attorneys for Plaintiffs*

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
Maximiliano D. Couvillier III  
United States Magistrate Judge

DATED: March 7, 2024